FOLEY & FOLEY 535 High Mountain Road Suite 210 North Haledon, New Jersey 07508 Phone (973) 304-6003 Counsel for Plaintiff

AMERICAN ASSET FINANCE, LLC,

Plaintiff,

٧.

The Corea Firm, PLLC and Thomas M. Corea, Esq.,

Defendants.

SUPERIOR COURT OF NEW JERSEY LAW DIVISION: PASSAIC COUNTY

DOCKET NO. PAS-L-/309-11

CIVIL ACTION

AFFIDAVIT

Peter J. Speziale, being duly sworn and of full age, deposes and says as follows:

- 1. I am the President and CEO of Modeso LLC, d/b/a RapidFunds, a company that purchases interests from attorneys in their attorney fees on settled claims and settled in ED civil actions.

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- 2. In January, 2011, my office received an application from and had telephone calls with Tom Corea inquiring about our services in connection with his desire to assign and sell some or all of his interest in his legal fee in the settled matter entitled Howard Wright v. HealthSouth Corporation, et al. Mr. Corea represented that he was entitled to \$90,000 from the total settlement proceeds of \$225,000. Attached hereto as Exhibit 1 is a copy of the said application.
- 3. Based on Mr. Corea's inquiry and application, I requested a search for open UCC filings on The Corea Firm, PLLC and Mr. Corea. The search identified an open UCC-1 filed by American Asset Finance, LLC, against The Corea Firm, PLLC and

Mr. Corea relating specifically to their interest in the Wright case.

- 4. On January 12th or 13th, 2011, I questioned Mr. Corea regarding the open UCC. He indicated that the UCC filed by American Asset Finance was terminated. Later that day, he provided to me a copy of a UCC-3 filed by The Corea Firm, PLLC indicating that the open UCC-1 had been terminated.
- 5. On January 13, 2011, I spoke with Tim Foley, a representative of American Asset
 Finance, LLC (American Asset) in connection with my due diligence related to the
 application from Mr. Corea. Mr. Foley informed me that Mr. Corea and the Corea
 Firm, PLLC had assigned most of his interest in the Wright case to American Asset
 on January 7, 2011. Mr. Foley informed me that the UCC-1 had been filed by
 American Asset pursuant to its agreement with The Corea Firm, PLLC and Mr. Corea
 and remained in effect.
- 6. When provided with a copy of the UCC-3 termination, Mr. Foley confirmed that the termination filing had not been authorized by American Asset and was fraudulent.

 FURTHER AFFIANT SAYETH NOT.

Dated: Feb. 11, 2011

Name: Peter J. Speziale, Esq.

STATE OF NEW YORK

COUNTY OF WESTCHESTER

On February 1, 2011, before me, personally appeared the above signed known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity, and that by his/her/their signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

MIGUEL H. CERVANTES Notary Public, State of New York No. 01CE6168482

Notary

Qualified in Westchester County Commission Express June 11, 2011